From:	Montgomery, Michael
To:	Li, Corine; Lee, Bessie; Johnson, AudreyL; Louis, Gail
Subject:	FW: Data interpretation through 8/16
Date:	Friday, August 21, 2015 2:48:46 PM
Attachments:	Comparison of Daily Total and Dissolved Metals Results to Applicable Standards.docx

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From: Allen, HarryL
Sent: Thursday, August 20, 2015 4:45 PM
To: Montgomery, Michael; Hashimoto, Janet
Subject: FW: Data interpretation through 8/16

UPDATE

From: Allen, HarryL
Sent: Thursday, August 20, 2015 4:44 PM
To: Yogi, David; Harris-Bishop, Rusty; Manzanilla, Enrique; Montgomery, Michael; Hiatt, Gerald
Cc: Calanog, Steve; Tenley, Clancy
Subject: Data interpretation through 8/16

EPA contends that variability of our surface water data on the San Juan is consistent with the pre event/historical variability in results from the San Juan watershed in general. Results suggest that the plume may have reached the Four Corners sampling station on 8/11 as results seem to peak at the Four Corners station at that time. Similarly, results peak at the Hogback station on 8/11, trailing off and stabilizing at very low concentrations for metals of interest.

Variability of data throughout the river system, compounded with events and inputs downstream, seem to mask the Gold King release event concentrations beyond Four Corners. As examples, EPA believes that storms on 8/8 and 8/12 and likely contaminant input locations such as McElmo Creek, potentially the Chinle Wash and other significant non-point source inputs, create variability such that we cannot conclude that later results are related to the incident.

Is it safe? (see attachment for daily details)
Throughout the sampling period, across EPA and NNEPA's surface water sampling stations, most metals results fell below screening levels with some scattered peaks exceeding levels in point-to-point comparisons. Results have also trended downward, presently marginally exceeding NN agricultural screening levels in one location for one metal. All metal concentrations in sediments throughout the sampling period were below Recreation Screening Levels (RSLs) representing pre and post release conditions.

For drinking water EPA contends that all water availabale to publicly operated potable sources

should meet MCLs at distribution points. This is the case for water throughout the sampling period despite the plumes measurable impact. While EPA continues to screen and evaluate private water sources such as wells, Navajo Tribal Utilities Authority should be consulted about their ability to meet standards at their distribution points.

How do concentrations compare to background conditions?

EPA continues to sample and has begun monitoring the San Juan to draw comparisons to baseline conditions. We will continue to research information on a pre-event river conditions for evaluation and transmission to Navajo and bordering State authorities. Sources of information include Navajo EPA surface monitoring results from 2011-2013 on the San Juan River, STORET data, USGS reports and specific area Navajo EPA SWQ assessment reports.